

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

STAG WILLIAMSPORT, LLC,

Plaintiff,

v.

BHN ASSOCIATES, LLC,

Defendants.

**Civil Action No.
1:21-cv-11958-NMG**

PLAINTIFF STAG WILLIAMSPORT, LLC's CITIZENSHIP DISCLOSURES

Pursuant to this Court's December 20, 2022 order regarding its subject matter jurisdiction over this case, Plaintiff, STAG Williamsport, LLC ("STAG"), states as follows¹:

1. STAG is a Delaware limited liability company with a principal place of business at One Federal Street, 23rd Floor, Boston, Massachusetts.

2. STAG's sole member is STAG Industrial Holdings, LLC, a Delaware limited liability company with a principal place of business at One Federal Street, 23rd Floor, Boston, Massachusetts.

3. STAG Industrial Holdings, LLC's sole member is STAG Industrial Operating Partnership, L.P., a Delaware partnership with a principal place of business at One Federal Street, 23rd Floor, Boston, Massachusetts.

4. The General Partner of STAG Industrial Operating Partnership, L.P. is STAG Industrial GP, LLC, whose sole member is a Maryland corporation with a principal place of business at One Federal Street, 23rd Floor, Boston, Massachusetts.

¹ All statements refer to relevant identities, domiciles, states of incorporation and principal places of business at the time this action was removed to the Court.

5. The Limited Partners of STAG Industrial Operating Partnership, L.P. are the following:

- a. Individuals, none of whom are domiciled in New York: Karen Carpi Bohlin, Benjamin Butcher, Michael Chase, Daniel K. Ericson, Alan J. Hirsch, Michael E. Hirsch, Bradford Sweeney, Nestor Weigand, David Barker, Jit Kee Chin, Virgis Colbert, William Crooker, Michelle Dilley, Peter Fearey, Jeffrey Furber, Larry Guillemette, F.X. Jacoby III, David King, Brian LaMont, Edward Lange Jr., Andrew LeStage, Christopher Marr, Rowan McFeely, Stephen Mecke, Jaclyn Paul, Matts Pinard, Alan Simmons, Gregory Sullivan, Jeffrey Sullivan, Hans Weger, and Kurt Flionis;
- b. Trusts: The Shelly Koffler Trust, UDT Dated 12-27-12 and The Susan Solomon Auerbach Trust, UDT 12-27-12 – the trusts have confirmed that none of their trustees are domiciled, incorporated, or have principal places of business in New York;
- c. The Morrison Energy Company, Inc., a Kansas corporation with its principal place of business in Kansas;
- d. Limited Liability Companies: FC Capital Partners, LLC; Innovative Promotions LLC; NED STAG III Residual LLC; NED Equity Holdings LLC and Roseview Capital Partners, LLC – the managing members of these LLC's have confirmed that none of their members are domiciled, incorporated, or have principal places of business in New York.

- e. The Haughey Family Limited Partnership, a Massachusetts Partnership, the general partner of which has confirmed that none of the partners are domiciled, incorporated, or headquartered in New York.
6. Defendant BHN Associates, LLC (“BHN”) is a New York limited liability company, with a principal place of business in New York. Each of BHN’s members is a natural person permanently residing in the State of New York.
7. Consequently, complete diversity exists between STAG and BHN.

Respectfully submitted,

STAG WILLIAMSPORT, LLC
By its attorneys,

/s/ Benjamin M. Greene
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Date: January 20, 2023

CERTIFICATE OF SERVICE

I, Benjamin M. Greene, hereby certify that on this 20th day of January, 2023, this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Benjamin M. Greene
Benjamin M. Greene